

1 HEATHER E. WILLIAMS, #122664
2 Federal Defender
3 NOA E. OREN, #297100
4 Assistant Federal Defender
5 Designated Counsel for Service
6 801 I Street, 3rd Floor
7 Sacramento, California 95814
8 Telephone: (916) 498-5700/Facsimile: (916) 498-5710
9 Noa_Oren@fd.org

10 Attorney for Defendant
11 ANGEL SANTIAGO RIVERA

12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,) Case No. 2:21-CR-00179-TLN
16 Plaintiff,)
17 v.) **STIPULATION AND ORDER TO
18 CONTINUE STATUS CONFERENCE AND
19 EXCLUDE TIME**
20 ANGEL SANTIAGO RIVERA)
21 Defendant.) Date: January 12, 2023
22) Time: 9:30 a.m.
23) Judge: Troy L. Nunley
24)

25 IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States
26 Attorney, through James Conolly, Assistant United States Attorney and attorney for Plaintiff,
27 and Heather Williams, Federal Defender, through Assistant Federal Defender, Noa E. Oren, that
28 the status conference for November 17, 2022 be continued to January 12, 2023 at 9:30 a.m.

29 The reason for this continuance is to allow defense counsel additional time to review
30 discovery and investigate avenues for mitigation. The government has offered a plea in this case
31 and defense counsel requires additional time to review the offer with her client who has been
32 transferred.

33 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be
34 excluded from the date of the parties stipulation through and including January 12, 2023;
35 pursuant to 18 U.S.C. §3161 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and General Order

1 479, Local Code T4 based upon continuity of counsel and defense preparation.

2 Counsel and the defendants also agree that the ends of justice served by the Court
3 granting this continuance outweigh the best interests of the public and the defendants in a speedy
4 trial.

5 DATED: November 9, 2022

Respectfully submitted,
HEATHER E. WILLIAMS
Federal Defender

6
7 /s/ Noa E. Oren
8 NOA E. OREN
9 Assistant Federal Defender
10 Attorney for Defendant
11 ANGEL SANTIAGO RIVERA

12 DATED: November 9, 2022

PHILLIP TALBERT
United States Attorney

13 /s/ James Conolly
14 JAMES CONOLLY
15 Assistant United States Attorney
16 Attorney for Plaintiff

ORDER

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing, adopts the stipulation in its entirety as its order. The Court specifically finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds that the ends of justice served by granting the continuance outweigh the best interests of the public and defendants in a speedy trial.

The Court orders the status conference scheduled for November 17, 2022 be continued to January 12, 2023 at 9:30 a.m. The Court orders the time from the date of the parties' stipulation, up to and including January 12, 2023, excluded from computation of time within which the trial of this case must commence under the Speedy Trial Act, pursuant to 18 U.S.C. §§3161(h)(7), and Local Code T4.

DATED: November 10, 2022

Troy L. Nunley

Troy L. Nunley
United States District Judge